## **Industrial Pretreatment Quarterly**

Published for Industrial Dischargers by the KCIW Program











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#### **Mission Statement**

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

## Industrial Waste Advisory Committee

Kevin Burrell,
Environmental Coalition of South
Seattle (ECOSS)
Ken Gross, GM Nameplate
Sandy Hallberg, Asko Processing
Scott Woerman, North Creek Analytical
Donna Hoskins, Berlex Laboratories
Bill Hughes, Circuit Partners
Mike Jeffers, Envirotech Systems
Kim Niino, Safeway Distribution Center
Tom Raymond, Honeywell, Inc.
Steve Skodje, Cargill, Inc.
Doris Turner, Boeing Commercial
Airplane Group- Renton
Chris VanHoof, City of Kent

# The King County Industrial Waste Program salutes the 2002 Award and Recognition Program Awardees

(awarded in 2003 and listed here throughout that year)

### Commitment-to-Compliance Award

Boeing Commercial Airplane – Renton Circuit Services WorldWide LLC Industrial Container Services, Inc. Time Oil Company Universal Sheet Metal, Inc.

#### Foam at the South Treatment Plant

The foam you see in the pictures was first noticed at 6 a.m. on September 26, at King County's South Treatment Plant in Renton. Perhaps this date, plus the dates of similar events will have some meaning to a reader: July 8 and October 10, 2003, and December 28. 2001.



These foam incidents were probably caused by the discharge of some kind of concentrated soap, detergent, or protein. If you have any information concerning what may have caused these events please contact King County Industrial Waste at 206-263-3000.



On all of the above dates the South Plant received similar foam discharges. While these incidents were mainly a nuisance, they could have caused serious environmental damage, damaged the treatment facility, or caused an NPDES (National Pollutant Discharge Elimination System) violation.

#### **Inside This Issue:**

- Foam at South Treatment Plant News:
- New self-monitoring reporting forms; KCIW wins EPA award; KCIW's customer satisfaction survey
- Tips: Self-monitoring reporting Brownfields Program
- KCIW Advisory Committee Meeting, September 10
- Recent enforcement actions KCIW violations advertising explained / Preventing significant noncompliance

### **KCIW News Briefs**

#### **New Self-monitoring Reporting forms issued**

KCIW has designed new self-monitoring report forms to make reporting easier for dischargers and to ensure accurate data entry at our end. New forms, customized to industrial users' permit reporting requirements, are based on annual, semi-annual (semester) and quarterly reporting periods. We have also updated the original monthly reporting form. We have general rules and detailed instructions for completing the forms. The proper forms are being mailed to each permit holder.

You can print out or download the forms and instructions at KCIW's Web pages. Go to the Web page http://dnr.metrokc.gov/wlr/indwaste and click on the word "Forms" on the left hand navigation column. The downloaded forms can be filled out on your computer.

For further information, contact the KCIW Compliance Investigator assigned to your site.

#### KCIW wins EPA award

KCIW has received special recognition for its Key Manhole program and other efforts by earning a prestigious Clean Water Act Recognition Award from the U.S. Environmental Protection Agency (EPA). The EPA commended "the exceptional pretreatment efforts by your community and the dedication" of the program.

KCIW Program Manager Elsie Hulsizer praised both the cooperation of the community of industrial dischargers, and KCIW staff for its excellent performance in routine permitting as well as in special projects such as its Key Manhole program. Since its inception in the late 1980's, the innovative program has supplied samples used to track down sources of illegal discharges that adversely affect sewage treatment plants and surface-water quality.

The EPA presented the award to KCIW in October at a national conference of the Water Environment Federation.

#### KCIW conducts second customer satisfaction survey

KCIW conducted its second survey of waste discharge permit holders to track permit holders' experiences and opinions. This survey, similar to the first conducted in 2001, added questions targeted to priorities for spending and importance of information provided by the KCIW.

The survey assessed perceptions:

- The quality and perception of the IWP, customer service and staff
- Assess perceptions of the effectiveness of the IW Pretreatment Quarterly, IWP website and Awards program
- Determine priorities for selected IWP activities
- Determine preferences for information provided bye the IWP

(continued on Page 6)

#### **Gold Award**

 $Alaskan\ Copper\ Works-6th\ Ave.$ 

Amgen Corporation

B.S.B. Diversified Company

Baker Commodities, Inc.

Ball Metal Beverage Container Corp.

Boeing Commercial Airplane -

North Field

Boeing Commercial Airplane – Renton

**Boeing Electronics Center** 

Boeing Integrated Defense Systems - Kent

Bunge Foods

Burlington Northern/

Santa Fe Railroad Company

Burlington Environmental - Kent

Carnitech US, Inc.

Circuit Partners, Inc.

Circuit Services WorldWide LLC

Circuits Engineering, Inc.

Coal Creek Development Corp. –

Landmarc Technologies

Color Tech

Crane-Eldec Corporation -

Martha Lake Facility

Crane-Eldec Corporation -

North Creek Facility

Davis Wire Corporation

**Emerald Recycling** 

Foss Maritime Company

GM Nameplate, Inc.

Green Garden Food Products, Inc.

I-90 Express Finishing

Industrial Container Services, Inc.

**Industrial Plating Corporation** 

Interstate Brands Corp. – Hostess

Kenworth Truck Company - Renton

King County Road Services Division -

Renton Decant Station

King County Solid Waste -

Cedar Hills Landfill

Magnetic and

Penetrant Services Company

Marine Vacuum Service

Mastercraft Metal Finishing, Inc.

Oberto Sausage Company - Airport Way

Pacific Iron & Metal

Pacific Metallurgical

Pepsi-Cola Company

Philip Environmental Services Corp.

Pioneer Human Services

Precor USA – Plant 1

Precor USA – Plant 2

#### **Gold Award continued**

Puget Sound Energy Redhook Brewing Company Rexam Beverage Can Company Safeway, Inc. – Beverage Plant Seattle Barrel Company Seattle FilmWorks Manufacturing / PhotoWorks, Inc. Seattle Solid Waste - Kent Highlands Landfill Shasta Beverages Skills, Inc. – Auburn Facility Skills, Inc. Smith Fabrication, Inc. Stockpot, Inc. Time Oil Company Universal Brass, Inc. Universal Sheet Metal, Inc. Vectra Fitness Vitamilk Dairy, Inc. Western Pneumatic Tube Western Processing Trust Fund II Weyerhaeuser Company

#### **Silver Award**

A. O. Smith Water Products Company Arco Petroleum Products Co. -Seattle Terminal Asko Processing Cedar Grove Composting Costco Wholesale Electrofinishing, Inc. **Emerald Sanitary Services LLC** Flow International Corporation Genie Industries – Bldg. 11 – Canyon Park Plant Genie Industries - Bldg. 3 & 4 Genie Industries – Bldg. 6 & 7 – Scissors Plant Glacier Northwest - Kenmore Hytek Finishes Northstar Beverage Company Prototron Circuits, Inc. Quality Finishing, Inc. Siemens Medical Solutions USA -Ultrasound Group Surftech Finishes Company Tri-Way Industries Western Metal Arts

### **Industrial Pretreatment Tips**

#### **Self-monitoring reporting tips**

### 1. Know the sampling requirements as per your Wastewater Discharge Permit.

This specifies what must be sampled, the sampling frequency and submission deadlines for reports.

- 2. Collecting samples at the beginning of the month is the best practice, especially if you only have to take one sample. If you have a monthly average limit the samples may pass your daily average but not your monthly average limit. In that case, you can take additional samples to bring the average down.
- **3.** Taking "splits" of King County compliance samples: When King County comes to collect its sample, you should opt for a split sample:
  - You can use the sample if you run it as required self-monitor ing data to determine compliance.
  - You can average this data with King County data. (If you have a King County violation and the split is in compliance, you can average this data into the analysis.)

(For more information on split samples, you can review a September 2002 Pretreatment Quarterly "Tips" article entitled "The King County Industrial Waste Program will split compliance samples with facilities." This is posted on our Web pages under "Quarterly Publication" or can be faxed, mailed or emailed per your request.)

#### 4. Set up a certification system:

When you are signing the report, but others are collecting information, it's important that all involved are trained to properly gather and evaluate the information submitted.

Preserve samples. Periodically check the original lab records against the report.

#### 5. Report all data:

Report all data at the sample site that is run by the approved methods listed in the permit. (For example, if you collect an extra grab sample during a given month, you must report it.)

For further information contact the KCIW compliance investigator assigned to your facility or contact KCIW.

## King County Brownfields Program offers

You may qualify for free technical assistance, grants, and low-cost loans through King County's Brownfields Program, increasing the value of your business and commercial or industrial property.

The Brownfields Program offers assistance to business and property owners interested in assessing, cleaning up and redeveloping environmentally contaminated land, known as brownfields. Seattle and King County are a federally designated Brownfields Showcase community. This gives our community priority to receive federal resources for assessment, cleanup and redevelopment. Here are the types of assistance that are available for qualified participants:

- Site assessment and characterization
- Cleanup planning and design
- Technical assistance with sampling and cleanup
- Low-cost loans, grants and bonds
- Free, technical assistance from the Environmental Extension Service (EES)

The Brownfields Program can help save you money on cleanup by linking you with resources for each of the following three stages a brownfields project goes through: (1.) Assessment; (2.) Cleanup; and (3.) Redevelopment.

#### **STAGE 1: Assessment**

An assessment evaluates a property's contamination and develops a cleanup plan. Activities include background research, sampling, risk analysis and review of various cleanup alternatives.

#### How the Brownfields Program can help...

- You may be eligible for low-interest loans from the King County/Seattle Assessment Loan Fund.
- You may be eligible for free technical assistance through the Environmental Extension Service (EES). This includes assistance with site charac terization, cleanup strategies and consultant referrals.
- You may be eligible for technical assistance from programs of the U.S. EPA and the U.S. Army Corps of Engineers.

 You can obtain technical data on the flow of groundwater in the Duwamish Basin.

#### **STAGE 2: Cleanup**

A cleanup action involves designing and implementing a plan to address the risks posed by the contamination at a site. Cleanup activities may include containment, removal or treatment of hazardous substances.

How the Brownfields Program can help...

- You may be eligible for a low-interest loan from the Brownfields Cleanup Revolving Loan Fund.
- You may be eligible for technical assistance from the Army Corps of Engineers.
- You may be eligible for grants and loans from the U.S. Department of Housing and Urban Develop ment (HUD) if the resulting redevelopment will create jobs and provide benefits for low- and moderate-income areas.

#### **STAGE 3: Redevelopment**

Redevelopment involves business expansion or new uses for vacant or underutilized industrial or commercial property.

#### How the Brownfields Program can help

- You may be eligible for HUD grants and loans if your project creates jobs and provides benefits for low- and moderate-income areas.
- You may be eligible for financial assistance from the Small Business Administration for redevelop ment that meets their criteria.
- You may be eligible for King County and City of Seattle tax-exempt Industrial Revenue Bonds for expansion or development of new manufacturing plants.

Please contact Lucy Auster with the King County Solid Waste Division, to learn more about the Brownfields Program and the qualifications to participate. Call 206-296-8476 or e-mail lucy.auster@metrokc.gov or go to www.dnr.metrokc.gov/swd/brownfields/index.htm, the program's Web pages.

## funding and technical assistance

#### **Brownfields Success Stories**

#### Help with contamination for property owner

When the new owner of a former chemical manufacturing site put their property up for sale, they discovered it had been contaminated for years. They subsequently turned to the Brownfields Program for assistance.

Through the Brownfields Program, the Environmental Extension Service (EES) staff conducted a site visit, reviewed files and helped the owner develop a strategy for assessing and cleaning up the property.

This strategy included a combination of sampling, soil cleanup and an analysis of groundwater treatment alternatives. The property owner received free technical assistance from the Army Corps of Engineers to research groundwater treatment options.

The EES also provided redevelopment assistance by identifying a tenant for the property, a company that recycles concrete into landscaping blocks.

Results: To date, the property has been returned to productive use, the groundwater treatment study is nearly complete, and the project has resulted in four cleanup construction jobs and 10 permanent jobs.



# The Environmental Extension Service (EES)

The EES is a free service of the Brownfields Program and works one-on-one with small to medium-sized businesses. It provides technical information, analyzing environmental issues and identifying solutions. The EES also provides education and services relating to pollution prevention, stormwater management, energy conservation and hazardous materials management.

Contact the EES by calling the Environmental Coalition of South Seattle (ECOSS) at 206-767-0432, or visit <a href="http://www.ecoss.org/forbusiness/ees.htm">http://www.ecoss.org/forbusiness/ees.htm</a> on the Web.

#### Technical assistance for a marine business

A business in the City of Seattle in need of a new location found a vacant brownfield that was a perfect fit for its operations, but was concerned about the presence of contamination and other environmental challenges. The business was able to utilize the Environmental Extension Service to help it evaluate the environmental situation and create a strategy for assessing and cleaning up the property. This assistance enabled the business to take on the challenges of relocating to this abandoned brownfield property.

An Environmental Extension Agent provided guidance to the business owner throughout the assessment and cleanup process. The agent reviewed initial consultant recommendations for assessment and cleanup and made alternative suggestions that resulted in cost savings of \$160,000.

The agent also linked this business to other environmental improvement programs offered by King County and the City of Seattle. The <u>Local Hazardous Waste Management Program in King County</u> helped this business consolidate their hazardous waste streams and storage systems. The City of Seattle's energy conservation program provided this business with a \$15,000 grant for energy conservation improvements, including a new compressor and new lighting. These improvements will contribute approximately \$4,000 a year in ongoing energy savings. Finally, an Environmental Extension agent helped the business design a new stormwater management system and assisted with employee training on stormwater pollution prevention.

**Results:** The assistance provided to this business enabled it to continue and expand its operations within the City of Seattle, retaining 63 jobs and creating 20 new jobs.

## Summary September Industrial Waste Advisory Committee (IWAC) meeting:



#### 1. Announcements:

Doris Turner announced the upcoming Boeing and Washington State Department of Ecology-sponsored Industrial Stormwater Conference on October 7, 2003. This is a conference for permittees, regulators, local governments, vendors, consultants, and others who want to know the practical aspects of implementing the new stormwater permit at their facilities.

For more information, visit the Web pages for the conference **http://www.stormwaterweb.com/** or call 425-266-8173 or 253-931-6837.

### 2. Washington State Department of Ecology's TREE Program:

James DeMay and Michelle Costenaro from the Dept. of Ecology gave a presentation on their Technical Resources for Engineering Efficiency (TREE) Program. The TREE Program is a free technical-assistance service for businesses. The TREE team is a group of Ecology engineers and scientists with expertise in industrial processes and pollution prevention. The team finds ways for businesses to reduce waste, increase efficiency, and save money.

For more information, visit the program's Web pages at http://www.ecy.wa.gov/programs/hwtr/tree/ or contact James DeMay at 360-407-6338 or by e-mail at jade461@ecy.wa.gov.

#### 3. Industrial Waste Rewards & Recognition Program –New Leadership Criteria for EnvirOvation Award:

Elsie Hulsizer, Industrial Waste Program Manager, announced a new way for companies permitted by KCIW to win the EnvirOvation Award. KCIW is looking for companies that have shown leadership in helping other companies comply with industrial pretreatment regulations. Some ex-

amples of leadership could include communicating with other companies about waste reduction opportunities and pretreatment improvements or participation in trade organizations that work to develop Best Management Practices (BMPs). Companies should submit nominations by December 15 of each year. Each nomination will be reviewed for its merits on a case-by-case basis. If you have any questions about KCIW's awards program, please contact Kristin Painter at 206-263-3002 or by *kristin.painter@metrokc.gov*.

The next Industrial Waste Advisory Committee (IWAC) meeting: was scheduled for December 3, 2003 from 9 a.m. to noon in Room 105 at 130 Nickerson Street (Canal Place office park), Seattle. Agenda to be determined. Complete summaries for meetings are avaibleble by request (see below) or by going to www.dnr.metrokc.gov/wlr/indwaste/ lwac.htm.

The meeting site is wheelchair accessible. People who have needs or disabilities for which arrangements must be made ahead of time should contact the Industrial Waste Program. (For sign language interpreter requests, please to contact us at least two weeks before this event if possible.) Call 206-263-3000 (voice) or the Washington Relay Service at 1-800-833-6388 or e-mail bibiana.ameh@metrokc.gov.

(KCIW satisfaction survey continued from Page 2)

The quality of the program, services, and employees were rated:

- Excellent (20%)
- Very Good (57%)
- Adequate or Fair (20%)
- Poor (3%)

If you are interested in receiving a copy of the entire report either by mail or e-mail, contact KCIW's Barbara Badger at 206-263-3024 or TTY relay service at 1-800-833-6388, or e-mail barbara.badger@metrokc.gov.

This information is available on advance request in accessible formats for persons with disabilities. Please call 206-263-3000 or TTY relay service at 1-800-833-6388.

#### **Publication of recent enforcement actions**

This publication reports companies that were the subject of enforcement actions during the period of September 2003 through November 2003 (or have not been published previously) and their violations met one or more of the following criteria:

- Were found in significant noncompliance during the reporting period;
- Received fines; or
- Had violations that were unique or warrant special attention.

#### **Companies Found with Significant Noncompliance**

Company	Nature of Violation/ Type of Pollutant	Basis for Significant Noncompliance	Penalty	Comments
Arctic Ice Cream Novelties 1901-23 <sup>rd</sup> Ave So. Seattle, Washington 98144	The following Permit violations-failure to monitor pH continuously; failure to file self-monitoring reports for May, June, and July 2003; failure to manually self-monitor in lieu of continuous pH monitoring; failure to take immediate action to correct unauthorized discharge; failure to notify King County in order to prevent sewer damage; failure to operate all pretreatment equipment; failure to operate current in-line pH neutralization system.	Failure to file a required report within 30 days of its due date.	\$4,750 fine and \$1,870 post- violation charge.	Arctic Ice Cream Novelties resumed continuous pH monitoring, adjusting and recording and made administrative and procedural revisions to insure that the pretreatment system is properly operated and maintained.
Oberto Sausage Company 2005 Airport Way South Seattle, Washington 98134	Late report-permit renewal application.	Failure to file a required report within 30 days of its due date.	Final Notice	Oberto Sausage Company filed their discharge permit renewal application prior to the final notice deadline-no further action was required.

In addition to the above actions, King County Industrial Waste also issued enforcement actions for the following: cadmium (1); late reports (6); lead (1); sulfide-dissolved (1).

#### Tips for maintaining compliance.

The EPA defines significant noncompliance as occurring when:

- There have been "chronic violations"; that is, during a six-month period, at least 66% or more of the measurements of any one parameter, such as chrome, exceeds (by any magnitude) a daily average limit or daily maximum limit.
- There have been "technical review criteria" violations where, during a six-month period, 33% or more of all the measurements for any one parameter exceeds the average limit by a factor of 1.2 for heavy metals and organic pollutants or a factor of 1.4 for fats, oils, and grease.
- A pretreatment violation alone or in combination with other discharges, caused interference or pass through; that is, caused a violation of King County's NPDES (National Pollutant Discharge Elimination System Permitting Program) permit.
  - A discharge caused a threat to human health.
  - A discharger failed to complete a compliance schedule within 90 days after the scheduled completion date.
  - A discharger failed to file a required report within 30 days of its due date.
  - A discharger failed to report noncompliance accurately.
  - A violation adversely affected the operation or implementation of the local pretreatment program.

In general, the two best practices to enlist to avoid violations and prevent being published in the violator ad are to properly maintain your pretreatment system and to file your reports on time.

If you have questions about compliance, including when a report is due, contact the KCIW compliance investigator assigned to your facility; or contact KCIW. (see pg **X**).



#### Missed these workshops?

Want more information on a specific topic? IW will be glad to assist you. We have a variety of printed information, and are compiling suggestions for additional information on our web site, fliers or classes.





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